

November 13, 2002

Ted Hass  
Cascade-Siskiyou National Monument Team Leader  
3040 Biddle Road  
Medford, OR 97504

**Re: Access Fund Comments on the Cascade-Siskiyou Draft  
Resource Management Plan/Environmental Impact Statement**

Team Leader Hass:

The Access Fund welcomes the opportunity to comment on the Cascade-Siskiyou National Monument (CSNM) Draft Resource Management Plan/Environmental Impact Statement (Draft RMP). We look forward to working with the Bureau of Land Management to preserve climbing opportunities and conserve the climbing environment at the CSNM.

### **The Access Fund**

The Access Fund is a 501(c)3 non-profit conservation and advocacy organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climbing organization, with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rockclimbers and mountaineers nation-wide. The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission.

The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; works closely with local climbers, land managers, environmental organizations, and

other interest groups to manage and preserve climbing areas throughout the United States; develops and distributes climber education materials; acquires and manages land; and provides funding for conservation and impact-mitigation projects, and for scientific research relevant to the climbing environment. A significant number of the Access Fund's members climb in Oregon including the CSNM.

## GENERAL REMARKS

The Access Fund applauds the BLM for its ongoing efforts to solicit public feedback to the Draft RMP for CSNM. However, as written, the Draft RMP provides only limited alternatives that do not permit a reasonable range of management choices. Moreover, the Draft RMP reveals a management inclination that is uninformed regarding an established recreational use—specifically climbing.<sup>1[1]</sup> We look forward to working closely with the BLM on improving this aspect of the Draft CMP. Accordingly, the Access Fund must support Alternative A—no action—unless the BLM significantly amends Alternative D.

While the Draft RMP notes that “the Monument was not proclaimed for recreation reasons” and that recreation such as rockclimbing is “secondary to the purpose of the Monument” resource protection and recreation need not be mutually exclusive. Nearly every nation park and monument in the country has a mandate to protect its natural resources, yet these parks still effectively manage recreation so that visitors can experience these parks and monuments. Indeed, examples are plentiful across the country where resource protection and recreation management goals co-exist without little or no conflict.<sup>2[2]</sup>

CSNM’s establishing proclamation created a mandate “to protect an array of biological, geological, hydrological, archeological and historic objects.” Managing rockclimbing within CSNM so that it is enjoyed without significant impact to the environment is an easily attainable goal for the CSNM and at least one alternative in the Draft RMP should reflect this common land management practice.

---

<sup>1[1]</sup> For example, Alternative D would prohibit “power augers” to place permanent anchors. Power “augers” have never been used—nor could they ever—for placing fixed anchors. The BLM here is likely talking about power “drills.” A brief consultation with other land managers or climbing organizations would have provided this technical, yet insightful, information. Also, under Environmental Consequences on page 236 of the Draft RMP, the BLM states that there are “no documented occurrences of these activities” (e.g., rockclimbing) in the Monument to date, “so although these Alternatives [prohibiting such activities] might have a negative impact on paper, they have no negative impacts on existing uses, just potential uses.” Presumably, the BLM is talking about hang-gliding and para-sailing here, because rockclimbing is a long-standing historic use especially at Pilot Rock. Prohibiting rockclimbing would have very real negative impacts on a significant user group that frequents this area.

<sup>2[2]</sup> Consult the following for management plans that successfully balance a preservationist mandate with active recreation:

- • Devils Tower National Monument:  
[http://www.nps.gov/deto/deto\\_climbing/detosumm.html](http://www.nps.gov/deto/deto_climbing/detosumm.html)
- • Joshua Tree National Park:  
<http://www.nps.gov/jotr/manage/bcmp/sumframe.html>

As you are probably aware, the CSNM contains some of the most unique, popular, and challenging technical climbing opportunities in southwestern Oregon. The south side of Pilot Rock—CSNM’s primary climbing attraction—features a number of high quality multi-pitch routes that are popular among local Oregon climbers and students enrolled in the Outdoor Program at Southern Oregon University. CSNM’s relatively undisturbed natural environment and scenic qualities have made Pilot Rock into one of the finest climbing areas in the southwestern Oregon. Pilot Rock is especially important to regional climbers because it represents one of the few climbing opportunities in southwestern Oregon. The singular climbing experience found at Pilot Rock is part of the fundamental character of the CSNM, and management planning should provide for the preservation of the climbing experience to the greatest extent possible consistent with resource protection objectives.

The Access Fund is concerned with the preservation of climbing opportunities in the CSNM, and we have reviewed the Draft RMP to assess the probable effect of the proposed management direction on climbing and the climbing environment. Accordingly, the Access Fund offers herewith observations and suggested improvements to the CSNM’s Draft RMP.

### **Alternative A**

By default, the Access Fund supports the selection of Alternative A as the best approach for managing climbing at the CSNM because it is the least restrictive alternative with regards to climbing recreation. Because the proposed climbing restrictions presented in alternatives “B”, “C” and “D” exceed even the most restrictive standards for managing public lands, and because Alternative A is the only proposal offered in the Draft RMP that would not unreasonably restrict an established use of the region—one that has no documented history of negative environmental impact—the Access Fund can only support the no action alternative: Alternative A.

### **Alternative B**

Alternative B focuses on natural ecosystem processes in the management of plant communities, and offers the conclusory declaration that “[t]echnical rockclimbing . . . [is] not compatible with the objectives of the CSNM under this alternative and therefore [is] not allowed.” Furthermore, Alternative B states that “[a]ctivities such as recreation and visitor use are not promoted and accommodations for these uses would be minimal.” There are several obvious problems with this overly restrictive approach:

- • The CSNM was established “to protect an array of biological, geological, hydrological, archaeological and historic objects.” Nothing in this mandate requires the absolute preservation of plant communities at the total expense of recreation. Before excluding historic legitimate users from this area, the BLM should provide a rationale as to why this mandate requires the “hands-off” protection of a specific plant community (while a “hands-on” manipulation of a conifer population).

- • The Draft RMP provides no data showing that established visitor use (such as climbing) negatively impacts the CSNM resources that the BLM is required to protect. The BLM should at least provide a statement, if not extensive data, demonstrating that climbing is not compatible with the protection of plant communities before climbing is prohibited. As noted above, national parks and monuments across the country effectively protect native flora and fauna while still allowing historic low-impact recreation such as climbing.
- • It appears that no recreation “accommodation” exists in Alternative B despite the supposed “minimal accommodation” the BLM would give provide recreationists under this alternative. The BLM should at least provide some degree of accommodation for established low impact recreation uses such as climbing.

As written, the Access Fund cannot support the unnecessarily restrictive Alternative B.

### **Alternative C**

Alternative C—the preferred alternative—states that “[r]ecreation and visitor use [would be] accommodated at levels that don’t interfere with protection, maintenance and/or restoration of Monument resources.” Yet inexplicably Alternative C would arbitrarily prohibit rockclimbing in order to “protect the natural geologic features” of CSNM. Nowhere in the Draft RMP does the BLM provide any support for the proposition that rockclimbing negatively impacts geologic features. Before making absolute statements asserting that the impacts of recreation are not compatible with the mandate of protecting CSNM resources, the BLM should provide data showing (1) that there is impact attributable to climbing, (2) such impacts negatively conflict with CSNM’s mandate, and (3) that progressive management tools cannot be utilized to mitigate such impacts so that recreation and resource protection can co-exist.

The Access Fund works with resource managers around the country on a variety of public lands to help protect natural resources in areas visited by climbers, and we are willing to work closely with your office to identify and mitigate the environmental impacts associated with climbing at the CSNM. It is the Access Fund’s experience that virtually all potential threats or actual impacts to natural and cultural resources associated with climbing can be eliminated or reduced to acceptable levels through a combination of education, cooperation with the climbing community, and site-specific prescriptions such as seasonal restrictions or (in extreme cases) spatially limited closures. We are familiar with a wide range of resource concerns and appropriate mitigation responses, including erosion, loss of vegetation at staging areas, possible effects on nesting birds and rare species, effects on cliff-top (rim) ecologies, possible conflicts with cultural values, and human waste disposal.

For management solutions that balance resource protection with recreation, see the enclosed Access Fund publication, *Climbing Management: A Guide to Climbing Issues*

*and the Production of a Climbing Management Plan.* The goal of this publication is to share information and encourage greater consistency in climbing management in the US. Two years in the making, *Climbing Management* contains over 50 illustrations and previously unassembled information on topics such as climbing and cultural resource protection, bouldering management issues, practices to mitigate impacts to vegetation, liability, education and outreach. The document also contains 30 pages of appendices and a 10-page bibliography section.

As with Alternative B, the Access Fund cannot support the unnecessary and arbitrary restrictions contained in Alternative C.

### **Alternative D**

Alternative D would limit rockclimbing in CSNM to only Pilot Rock, while prohibiting the use of “power augers” to place “permanent protective devices” to protect natural geologic features. Presumably, the BLM here is referring to the use of power drills to place fixed anchors such as expansion bolts. The BLM should consider amending Alternative D to allow climbing throughout CSNM and provide for limited fixed anchors authorized through a permit process.

Besides Pilot Rock there is very little rockclimbing within CSNM, yet the climbing that does exist within CSNM provides one of the few such opportunities in southwestern Oregon. Just as in other public land units across the country, the BLM can balance resource protection at the CSNM with recreational opportunities. Again, the BLM provides no rationale for restricting climbing within CSNM to only Pilot Rock; absent a resource based (and documented) justification for this restriction, the BLM should change Alternative D to allow for climbing opportunities throughout the CSNM.

Fixed anchors, especially bolts, are sometimes controversial. In our experience working with land managers from across the country, concerns about bolting are almost never related to the resource impacts that may be associated with the placement and use of these traditional climbing tools, but rather to philosophical convictions. The BLM must protect the resource, but is required only to consider (not necessarily satisfy) the philosophical priorities of interest groups. The Access Fund maintains that any decisions regarding bolting should be grounded in a firm understanding of resource capacity, associated impacts, and acceptable rates of change to the natural environment. It is the Access Fund’s position that bolts are neither necessary nor appropriate for all climbing routes or even all climbing areas. However, the need for bolts to provide the desired climbing experience should be evaluated in relation to resource protections before any decisions are made to restrict the use of these tools. As written, the Draft RMP provides no such fixed anchor evaluation to justify a prohibition.

The placement of bolts on Pilot Rock is a rare occurrence. Indeed, fixed anchors have been placed very conservatively on only four routes; the tradition at Pilot Rock is to place bolts only where there is no opportunity for placement of removable protective devices. Because only a portion of Pilot Rock’s South Face is attractive to rockclimbers for new

route development. It is unlikely that more than a few more routes will be established on Pilot Rock that require additional fixed anchors. Again, the Draft RMP provides no data to show that these bolts have caused a negative resource impact.

The Access Fund encourages the BLM to consider authorizing the limited placement of fixed anchors in the CSNM. To address fixed anchor management the BLM should consider establishing a fixed anchor advisory committee (FAAC) comprised of experienced climbers familiar with (1) the specific conditions at the CSNM, and (2) establishing new routes that may require limited fixed anchors. The FAAC would review all route applications requiring fixed anchors, and evaluate whether such new route would enhance the climbing experience at the CSNM, or whether the proposed new route would unreasonably increase the density of routes in that particular area. After this first level of review, the FAAC would then make a recommendation to the recreation managers at CSNM as to whether the application should be approved, approved with conditions, or rejected. This FAAC evaluation analyzes the subjective aesthetic aspects of the proposal by a group of experienced climbers familiar with that particular area.

If the application were recommended for approval by the FAAC, then the BLM would evaluate the application for whether the proposed new route would adversely impact any sensitive geologic, natural or cultural resources in the CSNM. This BLM evaluation analyzes the objective environmental impacts of the proposal by appropriately trained BLM scientists. BLM officials could also approve or reject any application based on subjective aesthetic criteria that are acknowledged by the FAAC.

By allowing the FAAC to assume much of the administrative analysis related to new fixed-anchor applications, the BLM is relieved of a substantial amount of the workload related to such applications, yet the BLM retains crucial oversight and “veto power” over any applications approved by the FAAC. Clearly, the BLM has the authority and discretion to accept or reject any recommendation by the FAAC, but this system appropriately allows for climbers to evaluate proposal aspects that closely affect the quality of the climbing experience, while the BLM retains hands-on control over any proposals that would affect the environment. This type of system is well established at climbing areas across the country.<sup>3131</sup> Because there will likely be very few applications

---

<sup>3131</sup> For examples of similar fixed anchor application review procedures, and climbing advisory councils, consult the following:

- • Red River Gorge, Daniel Boone National Forest, KY:  
<http://www.rrgcc.org/index.php?category=Climbing+Advisory+Council>  
<http://www.rrgcc.org/index.php?category=New+Route+Application+Process>
- • Eldorado Canyon State Park, CO:  
<http://parks.state.co.us/eldorado/stewardship.asp>
- • Joshua Tree National Park, CA:  
<http://www.friendsofjosh.org/about/>  
<http://www.friendsofjosh.org/news/news/climbingCommittee.asp>
- • Iowa State Lands, IA:

to place new fixed anchors at the CSNM, the BLM's administrative burden regarding this process would be minimal.

If the BLM revises Alternative D to allow for climbing throughout the CSNM and provides for permitted fixed anchors, then the Access Fund could support this Alternative D in lieu of Alternative A (no action).

## **CONCLUSION**

As stated, The Access Fund supports the selection of Alternative A as the most appropriate climbing management approach because it does not unreasonably and arbitrarily restrict climbing. On the other hand, the Access Fund could support Alternative D if the BLM revises it to provide for climbing opportunities throughout the CSNM, and to allow for new permitted fixed anchor placements. With these new conditions, Alternative D could reasonably preserve climbing opportunities while at the same time ensure necessary resource protection at the CSNM.

The CSNM is a unique natural area and a local climbing resource of significant importance. On behalf of the American climbing community, the Access Fund appreciates the BLM's efforts to solicit public input. However, the BLM should develop a more reasonably balanced management direction that is inclusive of public preferences and values including rockclimbing. We hope our comments will provide a meaningful contribution to both the substance and clarity of the Draft RMP regarding planning goals, objectives, and strategies.

Sincerely,

Jason Keith  
Policy Director  
The Access Fund

Enclosure

Cc:

Elaine M. Brong, State Director, Oregon/Washington BLM  
Jeff Jarvis, Senior Wilderness Specialist, BLM NLCS  
Steve Matous, Access Fund Executive Director  
Shawn Tierney, Access Fund Access and Acquisition Director  
Ian Caldwell, Access Fund Oregon Regional Coordinator  
Larry Brumwell, Oregon Climbers Coalition  
Greg Orton, Oregon Climbing Guidebook Author  
Joe Chaves, Oregon Climber